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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH**

ERIC SCHIERMEYER, Derivatively on Behalf
of Nominal Defendant, BLOCKCHAIN GAME
PARTNERS, INC. D/B/A GALA GAMES,
Plaintiff,

vs.

WRIGHT W. THURSTON and TRUE NORTH
UNITED INVESTMENTS, LLC,
Defendants,

and
BLOCKCHAIN GAME PARTNERS, INC.
D/B/A BGP GAMES,
Nominal Defendant.

**MOTION FOR LEAVE TO FILE
OVERLENGTH OPPOSITION TO ERIC
SCHIERMEYER'S MOTION TO
DISMISS COUNTERCLAIMS**

Case No. 2:23-cv-00589-HCN-DAO

Judge Howard C. Nielson

Magistrate Judge Daphne A. Oberg

TRUE NORTH UNITED INVESTMENTS,
LLC, Derivatively on Behalf of Nominal
Defendant, BLOCKCHAIN GAME
PARTNERS, INC. D/B/A GALA GAMES,
Counterclaimant,

vs.

ERIC SCHIERMEYER,
Counterdefendant,

and

BLOCKCHAIN GAME PARTNERS, INC.
D/B/A BGP GAMES,
Nominal Counterdefendant.

TRUE NORTH UNITED INVESTMENTS,
LLC,
Crossclaim Plaintiff,

vs.

BLOCKCHAIN GAME PARTNERS, INC.
D/B/A BGP GAMES,
Crossclaim Defendant.

Defendant, Counterclaimant, and Crossclaim Plaintiff, True North United Investments, LLC (“True North”), by and through undersigned counsel, hereby respectfully moves the Court *ex parte* for leave to file an overlength Opposition to Eric Schiermeyer’s Motion to Dismiss Counterclaims (the “Opposition”) consisting of approximately 33 substantive pages.

ARGUMENT

DUCivR 7-1(4)(A)(i) authorizes response briefs not to “exceed 25 pages” exclusive of table of contents and exhibits. DUCivR 7-1(6)(A), however, allows the Court to approve an “Overlength Motion, Response, or Reply” upon a showing of “good cause why additional pages are needed”. Good cause exists here.

True North seeks leave to file its Opposition consisting of approximately 33 pages, exclusive of table of contents and exhibits. The excess pages are necessary to adequately respond to the arguments asserted in Plaintiff's Motion to Dismiss which attack each of the claims brought by True North on multiple grounds. True North has worked diligently to be as concise as possible but believes in good faith that to maximize the efficiency of these proceedings and conserve the resources of the Court, the overlength opposition is required to properly address the numerous arguments raised.

DATED February 2, 2024

GREENBERG TRAURIG LLP

/s/Marc Rasich

Marc Rasich

John Huber

Daniel Wadley

Alexander Baker

COOLEY LLP

Michael G. Rhodes

*Counsel for Defendants, Counterclaimant, and
Crossclaim Plaintiff*

CERTIFICATE OF SERVICE

I hereby certify that on February 2, 2024, a true and correct copy of the foregoing was filed with the Court's electronic filing system and thereby served on counsel of record.

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/s/ Lindsey Wharton